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July 10, 2023

BY ECF

Hon. Sidney H. Stein
United States District Judge
Southern District of New York
Daniel Patrick Moynihan U.S. Courthouse
500 Pearl Street
New York, NY 10007

Re: *United States v. Roger Thomas Clark*,
S2 15 Cr. 866 (SHS)

Dear Judge Stein:

Attached please find two additional letters of support on behalf of Roger Clark, received by my office today. These letters are from (1) Sunjeev Singh Paul; and (2) Carl Bretzlaff.

Respectfully yours,



Evan L. Lipton
Attorney for Roger Clark

Cc: Gov't counsel

July 9, 2023

[REDACTED]

[REDACTED]

Playa Del Carmen, Solidaridad
Mexico

[REDACTED]

[REDACTED]

Re: Roger Thomas Clark

Dear Judge Stein,

I've been invited to share with you an account of my relationship and some of my past interactions with Roger Thomas Clark.

I believe it may be appropriate to tell you a little bit about myself before I get into it. I'm 49 years of age and of East Indian descent. I was born to immigrant parents in Edmonton, Alberta, Canada. I was raised by a well educated and a well traveled family comprised of two Ph.D. parents and an older sister. I was privileged to attend and graduate from the American Embassy School in New Delhi, India where I was exposed to many cultures and made lifelong friends from all over the world. My education continued at a prestigious business University in New Delhi and subsequent education at the University of Alberta. I speak 5 languages and have lived in Canada, India, Ghana, St. Maarten, and now reside in Mexico as of October 2019 with my girlfriend. I spent nearly 20 years as a Re/Max Realtor in Edmonton and have worked in the sales industry for the majority of my adult years. I currently work as a sales manager at a well renowned resort company here.

Roger has had an important influence on my life, and I've given this invitation a great deal of consideration and reflection. In the following paragraphs I'll do my best to describe the role Roger played in my early adulthood, the meaningful lessons he offered and the lasting impact he's had since then.

I first met Roger Clark in late 1993. At that time, I was a young man in my early 20s, deep into post-secondary studies at the University of Alberta and paying my way through school via the hospitality and nightclub industries. Roger hired me as a nightclub manager at a busy bar location on the south side of Edmonton. To be honest, I'm not actually sure what he saw in me; it wasn't a popular time to hire a 'coloured' bar manager in central Alberta, especially one with no nightclub experience or credibility in the local industry. As it turned out, the owner of the establishment challenged his decision because there had been a fight involving a gang (East Indian) the previous weekend. Roger stood his ground and explained to the owner that I was right for the job. That said, I was eager to prove myself and Roger seemed keen to afford me the opportunity.

Dear Judge Stein

I have been asked to share with you some information regarding Roger Thomas Clark who I have known for quite some time. I have given this much thought and I would like to share with you some of my experiences with Roger who I have learned quite a bit from.

I cannot remember the exact year, but it was around 1991 range. I owned a very popular night club in Edmonton, and I was looking for a manager. Roger applied for the job as did many other people. My first impression of Roger was that he was well dressed, very polite, good personality and presented himself very well. I am very fussy who I hire just so you are aware. I did not decide right away as Roger did not have no experience running a night club. I observed him for the next couple of weeks when he came in with his friends. I noticed he did not drink very much nor did his friends, very important to me is that they are not alcoholics or into drugs.

So I hired Roger and in hindsight it was the right decision, he was a very fast learner and got along well with our staff of about 25 people. What really impressed me was he took so much interest in the staff, if they ever had a problem at work or even a personal problem, he was the first one to help them, talk to them and really care for them. I must say the staff really liked him. What I learned from Roger is you must develop a relationship with your staff as your staff are the most important part of any business.

Over the next couple of months, I noticed more and more regulars coming to our night club and many of them searched out Roger, he always had a smile on his face and made them feel very comfortable, he made sure he got to know their names and a little about them. Once again, I learned something else not only should you care about your staff, but your customers also want to be cared about.

As a businessman it was always about the numbers, saving money and making more money. Roger's approach changed me totally. Even to this day I have to say I have learned to take special interest and care more about my staff, get to know their names and more about them and pay more attention to your customers, we all want to be made special and that is what I have learned from Roger.

Over the next couple of months Roger took on more responsibilities with regards to handling large sums of cash, I learned to trust him completely and never once was there a problem with cash missing or the books not balancing.

I must admit I am pretty set in my ways, Roger was always finding new ways to do things that were more up to date and more efficient, he was always the one to encourage me to accept a new way of doing things, naturally I was stubborn but I have to admit he was responsible for most of the changes that I made at the night club. Once again, I have learned from Roger is to always be open to new ideas, always look for better ways to do things, keep an open mind is very important in business and in life it is just as important.

Over time we developed a friendship, you have heard the old saying take time to smell the roses. Well that certainly applies to me, it was usually all business for me. Roger would suggest I sit down with some customers, have a drink or enjoy a good meal, go to a hockey game or play some golf. This was also a very valuable lesson in life, there is more to life than making money.

I could share many other stories with you about Roger, he has taught me a lot, very valuable life skills that I still use today and will use it the rest of my life. I know he has changed my life in many ways and I also know of many other people that he has helped over the years, he was a giver not a taker, always wanting to help other people. God bless you, Roger Clark.

A handwritten signature in black ink, reading "Carl Bretzlaff". The signature is written in a cursive, flowing style with a large, prominent 'C' and 'B'.

Carl Bretzlaff
Business Owner

Some things that Roger came to know about me:

- I come from an Indian business family that was going through a strife-filled divorce.
- My father is an interesting and manipulative character who had zero qualms exploiting his relationship with me for gain in position or favour.
- Friendship is a gift I don't take lightly, I recognize those who add value to my life, and those who take it. I believe in reciprocity.

It was only a few days into my new position as night bar manager. One of the owners – a pseudo-celebrity individual and a well known local radio DJ – attempted to come behind the main bar to pour some drinks for himself and his friends. This is an industry-wide no-go. The situation turned hostile when I approached the man and asked him to step out from the bar. No racial slur or insult was spared as the man went on to put me in my place.

"Don't you know who I am, you Paki??" he screamed at me. How dare I protect the establishment and the integrity of my staff. Being as new as I was, it was going to get worse before it got better... until Roger intervened. He's a mindful and intentional individual. He saw that I needed backing and didn't hesitate. Not only did he – in that moment – come to reaffirm my decision on the matter, he also went on to put his job on the line in the management meeting that followed the next day. The part-owner was banned from the location at Roger's insistence. Perhaps it would have been to his detriment to passively erode the authority of his own new hire, but from my perspective, he went above and beyond to solidify it and to demonstrate his confidence in my judgement.

I learned so many things that night, but one lesson stands out; you can help someone rise to your expectations of them through support and participation. Roger could have let the situation melt down and he would have had an easy excuse to find a new, more experienced bar manager. Instead, that was a moment that helped galvanize our friendship and professional relationship and served as a catalyst for me to dig in and own my own success: good, bad or ugly, sweeping or marginal.

Another instance that stands out prominently in my mind is from early 1994. Roger and I were walking down Whyte Avenue (a bustling bar, boutique shoppe and restaurant strip in Edmonton) which we often did to check out other hospitality locations and 'scope out the competition' on slow nights. As we crossed an alley, we simultaneously witnessed a would-be mugging taking place. A young man was being harassed by a group of men, led by a large and intimidating alpha male. I don't think we had the opportunity to exchange glances, much less agree that we were going to step in. Before I could look back at him, Roger was into the scene and not giving up any ground. He single-handedly protected the unknown victim without blinking. Without violence or threat, Roger diffused the situation, and the young man was able to continue unscathed, wallet intact. He's always been a defender of those he loves and those who can't defend themselves.

I can't really remember what we talked about on the way back to our own bar, but I was all adrenaline, and Roger was all 'that's completely unacceptable behaviour'. He admitted to me later that he was shaking in his boots while confronting a 6'3" intimidating figure but that the intelligent and choice words he used were enough to diffuse the situation. I remember Roger being 5'6"ish and about 130 pounds at that time. Violence was never an option in his books. He taught me the power of words, which has served me well in all of my years in sales.

He walked the talk, and I think that's a big part of why my takeaways from our time together have been so staying. He showed me how to speak and act with integrity, and he enlightened me to servant leadership through his own example... not a prevalent style in the early 90s nightlife industry. Not a prevalent style even today.

On another occasion during my employment at the nightclub Roger hired me at, I had the opportunity to sit down with a rather high-profile patron. A high-profile, high-maintenance patron with a following of similar guests. It wasn't something I was excited to do, and easily something that Roger could have taken care of personally as General Manager of the establishment. However, instead of 'taking it off my plate', Roger talked me through the conversation before it happened. He reassured me of his support and that he'd be behind me no matter what. I'd love to say that I felt ten feet tall after the sit down – I certainly didn't – but it went well. As a manager my confidence grew, and of course that cascades to the people around you when you feel secure and competent in your position.

This is a notable lesson. In my position today, I have the responsibility to coach and lead a team of salespeople. In many ways, it's Roger speaking to them. That is the impact I experienced under his leadership. There are so very many noteworthy examples of Roger's character that I could write down. I wish we had that kind of time. I do wish to share a few more short stories though.

Roger exemplified loyalty and friendship in both word and action. On more occasions than I care to admit, he would arrive at my door unannounced to help me pack up my house ahead of the next move. These were times where I would normally have to beg or bribe friends to help wrap up my belongings in packing paper. He's intuitive and he's deeply committed to his family and friends. I may also be a predictable procrastinator but he alone showed up each time, nevertheless.

During our early friendship, I also had the pleasure to get to know some of Roger's family. In retrospect, it's easier to see how Roger viewed his relationships with other people than it was to see how he viewed his friendship with me. When he was travelling, he would request check-ins on his mother, who also lived in Edmonton at the time. Roger was always looking out for his family: I was happy to pop in when I was in the neighbourhood to say hello and make sure all was well.

I mentioned earlier that my father is a character. Roger spent countless hours listening to episode after episode of my 'did-me-wrong' and 'isn't-it-awful' testimonials. I felt safe to share and unpack my issues with him, he always heard me out with patience and an even, measured approach, which I think I appreciate more and more as time rolls on. Your Honour, in the absence of a loving, supportive father figure, I have had several outstanding mentors and confidants. Roger Clark has had my back and has protected my best interests since I met him. He is the only one in my life who had the position, the knowledge and perhaps the guts to share his viewpoints with my father directly. One day my father asked me for a ride to the airport. It was a busy day for me, and Roger happily offered to help. He drove my father to the airport that day and took the opportunity to have a heart to heart with my Dad. I heard about it later, but no one has ever gone to bat for me in that capacity- something I'll never forget.

At this point, it may seem like I have a unique friendship with Roger. And I believe that we have a true friendship, but I can also wholeheartedly vouch for the impact he had and the leadership he offered to so many other individuals that I witnessed personally. The nightclub and bar industry has a very unique culture. Co-workers often regard each other as family and lean on each other and support each other as such. Roger has an incredible ability to nurture a supportive environment and he developed loyalty amongst his staff that still comes up in conversation. He was, and is, intolerant of violence, racism, sexual harassment and anything that would make the workplace uncomfortable for anyone. I won't get into individual accounts, but under Roger's guidance and encouragement, many employees who had the opportunity to learn from him are *still in the industry* (successfully and happily I might add). It wasn't uncommon for Roger to be the one to 'answer the call' as it were. I can recall several accounts of Roger arriving on scene to change a tire, wait for a tow truck or otherwise save the day for a staff member in need... often in the wee hours of the morning. I believe he had a motto of 'If you find yourself in trouble and have no one to call, call me'. Suffice it to say, he is very loved by the people whose lives he's touched.

I remember Roger's leadership as being empathetic and encouraging. He could be fiery at times, but it was fueled by a 'you should believe in yourself more, because I believe in you' attitude. I have kept lessons and best practices that I learned from Roger with me throughout my endeavours, and I believe that they've served me very well. He taught me a great deal, helped me gain experience that propelled my career forward, and has been there for me as a friend many times over the years. I'm grateful for all those things.

We have been in contact sporadically while he was travelling. He was always interested in how I was doing, how my mother and sister were doing and how my career was moving forward. Always there with a friendly ear when I needed some advice or just to catch up quickly. Roger has been a mentor and a friend to me since he first hired me. He's had a profound and positive role over the years, not only in my life, but in the lives of the many people who had the privilege of getting to know him.

I understand that you will soon be sentencing Roger on a charge of Conspiracy to Distribute Narcotics. When he told me he had broken the law and was facing serious consequences for his actions, he was unequivocal that he was 100% responsible for his actions, and had nobody to blame but himself for the position he now finds himself in. I believe he knows that he's in this position today because of actions he took yesterday, and the poor decisions he made. While I was surprised at the criminal charges, I am not surprised at all that he is taking full responsibility for his actions.

Your Honour, thank you for the opportunity to share with you a few of the good things that Roger Clark has shared and that I carry with me today.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Sunjeev Singh Paul', with a long horizontal flourish extending to the right.

Sunjeev Singh Paul